



BORENSTEIN | MCCONNELL | CALPIN
ATTORNEYS AT LAW

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July 15, 2021

Via UPS Overnight & Hand Delivery

Betty Sebrow
12 Beechwood Drive
Lawrence, NY 11519

**Re: Harvey J. Bell v. Betty Sebrow
New Jersey Domestic Violence Civil Complaint and Temporary
Restraining Order Police Case # 21021279.**

Dear Ms. Sebrow:

Borenstein McConnell & Calpin, P.C. ("BMC") represents Harvey Bell in the above captioned matter. Please find attached a New Jersey Domestic Violence Civil Complaint and Temporary Restraining Order that was entered on July 15, 2021. A Zoom Hearing in this matter has been scheduled for July 22, 2021, at 8:30 a.m. Please contact the family Court in Essex County at 973-776-9300 ext. 57210 for the Zoom information.

Yours truly,

A handwritten signature in black ink, appearing to be "ABRAHAM BORENSTEIN", written over a horizontal line.

ABRAHAM BORENSTEIN, ESQ.

BA/abr

Enc.

Cc: Client via Email

Springfield
155 Morris Avenue
Suite 201
Springfield, NJ 07081

Lebanon
3 Werner Way
Suite 230
Lebanon, NJ 08833

New York City
4607 Fort Hamilton Parkway
Brooklyn, NY 11219

Due to the COVID-19 pandemic, please do not appear at the Courthouse. Your case may be heard remotely. Upon receipt of this order, you must contact the Family court immediately to get instructions for the date of your Final Restraining Order hearing. For your convenience all county Family Court numbers are listed below. All restraints remain in full force and effect until the final hearing.

**Family Court
County Phone
Numbers**

Atlantic	609-402-0100 x47580
Bergen	201-221-0700 x25185
Burlington	609-288-9500 x38834
Cape May	609-402-0100 x47710
Camden	856-650-9100 x43520
Cumberland	856-878-5050 x15640
Essex	973-776-9300 x57210
Gloucester	856-878-5050 x15520
Hudson	201-748-4400 x60830 201-748-4400 x60810
Hunterdon	908-824-9750 x13350
Mercer	609-571-4200 x74402
Middlesex	732-645-4300 x88560
Monmouth	732-358-8700 x87211 732-358-8700 x87160
Morris	862-397-5700 x75250
Ocean	732-504-0700 x64090
Passaic	973-653-2910 x24624
Salem	856-878-5050 x15881
Somerset	908-332-7700 x13007
Sussex	862-397-5700 x75184
Union	English: 908-787-1650 x21710 Spanish: 908-787-1650 x21720
Warren	908-750-8100 x13480

<input checked="" type="checkbox"/> TRO <input type="checkbox"/> Amended TRO						N.J.S.A. 2C:25-17 et seq.	
<input type="checkbox"/> Superior Court, Chancery Division, Family Part,				County		<input checked="" type="checkbox"/> Municipal Court of WEST ORANGE TOWN	
Docket Number				Police Case Number 21021279			
In the Matter of Plaintiff (Victim) BELL HARVEY J						Plaintiff's Sex <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	
Plaintiff's Date of Birth 12/21/1955							
Defendant Information		Last Name SEBROW		First Name BETTY		Defendant's Sex <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	
AKA		Defendant's Social Security Number		Date of Birth 02/01/1964		Race CAUCASIAN	
Home Address 12 BEECHWOOD DRIVE		City LAWRENCE		State NY		Zip 11559	
Home Phone Number (516)849-5863		Work Phone Number		Eye Color HAZEL		Height 5 02	
Employer		Driver's License Number		Distinguishing Features (Scars, Facial Hair, Etc.)			
Work Address		State		Driver's License Expiration Date			

The undersigned complains that said defendant did endanger plaintiff's life, health or well being (give specific facts regarding acts or threats of abuse and the date(s) and time(s) they occurred; specify any weapons):

ON (Date) 07/14/2021	AT (Time) 09:21 AM	BY (Details; specify any weapons) <p>MR. BELL STATES THAT IN THE FALL OF 2018, HE BEGAN A DATING RELATIONSHIP WITH MS. BAILA SEBROW. AFTER APPROXIMATELY 6 TO 8 WEEKS OF DATING, MR. BELL ADVISED MS. SEBROW THAT HE WISHED TO END THE RELATIONSHIP. SHORTLY AFTERWARDS, MR. BELL STATES MS. SEBROW BEGAN TO SEND NUMEROUS TEXT MESSAGES WHICH CONTAINED VULGAR AND SEXUALLY EXPLICIT LANGUAGE. MR. BELL STATES HE INFORMED MS. SEBROW THAT HE NO LONGER DESIRED TO HAVE ANY FURTHER COMMUNICATION BETWEEN THE TWO.</p> <p>SINCE 2018, MR. BELL STATES THAT ON NUMEROUS OCCASIONS, MS. SEBROW HAS SENT TEXT MESSAGES AND EMAILS IN WHICH SHE FALSELY ACCUSES MR. BELL AS BEING A RAPIST WITH MULTIPLE FEMALE VICTIMS. MS. SEBROW HAS THREATENED TO INFORM MR. BELL'S EMPLOYER OF THESE FALSE ALLEGATIONS. MR. BELL STATES MS. SEBROW HAS CONTACTED HIS FEMALE FRIENDS AND ASSOCIATES, IN AN ATTEMPT TO GATHER INFORMATION REGARDING HIS PAST SEXUAL HISTORY. MR. BELL ALSO STATES THAT HE HAS SEEN MS. SEBROW PRESENT AT THE SAME RELIGIOUS EVENTS HE ATTENDS. HE STATES THAT MS. SEBROW WOULD TYPICALLY NOT TAKE PART IN THESE GATHERINGS, BUT BELIEVES SHE DOES SO BECAUSE SHE IS AWARE HE WILL BE IN ATTENDANCE.</p> <p>RECENTLY, MR. BELL STATES CONTACT WITH MS. SEBROW HAS BEEN SPARSE AND INFREQUENT, BUT STATES HE HAS RECEIVED TEXT MESSAGES FROM UNKNOWN PHONE NUMBERS, CONTAINING SIMILAR CONTENT TO THE MESSAGES LEFT BY MS. SEBROW. MR. BELL BELIEVES MS. SEBROW IS USING THESE UNKNOWN PHONE NUMBERS TO CONTINUE THE HARASSING COMMUNICATION.</p> <p>MR. BELL OFTEN SEARCHES HIS NAME ON GOOGLE TO SEE IF ANYTHING HAS BEEN WRITTEN ABOUT HIM. RECENTLY THROUGH GOOGLE'S SEARCH ENGINE, MR. BELL DISCOVERED A TWITTER ACCOUNT TITLED "HARVEY BELL AND THE ISSUES OF DATE RAPE" WITH THE TWITTER HANDLE NAMED "@HARVEYDATERAPE". IN THE DESCRIPTION OF THE ACCOUNT, THE FOLLOWING IS WRITTEN: "HARVEY BELL, A 64 YEAR OLD FINANCIAL ADVISOR IN WEST ORANGE, NJ IS ACCUSED BY POLICE OF INCAPACITATING 100S OF VICTIMS BY PLYING THEM WITH DATE RAPE DRUGS." MR. BELL IS FEARFUL THAT HIS REPUTATION IS BEING SLANDERED DUE TO THESE CONSTANT FALSE ALLEGATIONS.</p>
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which constitute(s) the following criminal offenses(s): (Check all applicable boxes. Law Enforcement Officer: Attach N.J.S.P. UCR DV1 offense report(s)):

<input type="checkbox"/> Homicide	<input type="checkbox"/> Terroristic Threats	<input type="checkbox"/> Criminal Restraint	<input type="checkbox"/> Sexual Assault	<input type="checkbox"/> Lewdness	<input type="checkbox"/> Burglary	<input checked="" type="checkbox"/> Harassment
<input type="checkbox"/> Assault	<input type="checkbox"/> Kidnapping	<input type="checkbox"/> False Imprisonment	<input type="checkbox"/> Criminal Sexual Contact	<input type="checkbox"/> Criminal Mischief	<input type="checkbox"/> Criminal Trespass	<input type="checkbox"/> Stalking
<input type="checkbox"/> Criminal Coercion	<input type="checkbox"/> Robbery	<input type="checkbox"/> Contempt of a DV Order	<input type="checkbox"/> Any Other Crime Involving Risk of Death or Serious Bodily Injury			<input type="checkbox"/> Cyber Harassment

1. Any prior history of domestic violence reported or unreported? If Yes, explain: ☐ Yes ☒ No

2. Does Defendant have a criminal history? (If Yes, submit any available criminal history report) ☐ Yes ☒ No

3. Any prior or pending court proceedings involving parties? (If Yes, enter docket number, court, county, state) ☐ Yes ☒ No

4. Has a criminal complaint been filed in this matter? (If Yes, enter date, docket number, court, county, state) ☐ Yes ☒ No

5. If Law Enforcement Officers responded to a domestic violence call:
 Were weapons seized? If Yes, describe: ☐ Yes ☒ No Was Defendant arrested? If Yes, describe: ☐ Yes ☒ No

6. (A) The Plaintiff and Defendant are 18 years old or older or emancipated and are: (select one)
☐ Married / Civil Union ☐ Divorced ☐ Present Household Member ☐ Was at Any Time a Household Member OR
 (B) The Defendant is 18 years old or older or emancipated and Plaintiff and Defendant are: (select one)
☐ Unmarried ☐ Co-Parents ☐ Expectant Parents ☒ Plaintiff and Defendant have had a dating relationship

Docket Number	Defendant's Name BETTY SEBROW												
<p>7. Where appropriate list children you have with the Defendant, if any (include name, sex, date of birth, person with whom child resides)</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; width: 35%;">Child's Name: Last</th> <th style="text-align: left; width: 15%;">First</th> <th style="text-align: left; width: 15%;">M.I.</th> <th style="text-align: left; width: 10%;">Sex</th> <th style="text-align: left; width: 15%;">Birth Date</th> <th style="text-align: left; width: 10%;">Resides</th> </tr> </thead> <tbody> <tr> <td colspan="6" style="height: 40px;"></td> </tr> </tbody> </table>		Child's Name: Last	First	M.I.	Sex	Birth Date	Resides						
Child's Name: Last	First	M.I.	Sex	Birth Date	Resides								
<p>8. The Plaintiff and Defendant:</p> <div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Presently; <input type="checkbox"/> Previously; <input checked="" type="checkbox"/> Never: Resided Together </div> <div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Family Relationship: What is your relationship to the defendant? (Specify) </div>													
<p>Certification</p> <p>I certify that the foregoing responses made by me are true. I am aware that if any of the foregoing responses made by me are willfully false, I am subject to punishment.</p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="text-align: center;"> <p><u>07/15/2021</u></p> <p>Date</p> </div> <div style="text-align: center;"> <p><u>HARVEY J BELL</u></p> <p>Signature of Plaintiff</p> </div> </div>													

NOTICE TO DEFENDANT: A violation of any of the provisions listed in this order may constitute either civil or criminal contempt pursuant to N.J.S.A. 2C:25-30 and may result in your arrest, prosecution, and possible incarceration, as well as an imposition of a fine or jail sentence. **Only a court can modify any of the terms or conditions of this court order.**

Domestic Violence Civil Complaint and Temporary Restraining Order Docket Number:	Defendant's Name BETTY SEBROW
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Part 1 - RELIEF - Instructions: Relief sought by Plaintiff

DEFENDANT:

TRO	FRO	TRO Granted	
1. <input checked="" type="checkbox"/>	N/A	<input checked="" type="checkbox"/>	You are prohibited from returning to the scene of violence.
2. <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	You are prohibited from future acts of domestic violence.
3. <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	You are barred from the following locations: <input checked="" type="checkbox"/> Residence(s) of Plaintiff <input checked="" type="checkbox"/> Place(s) of employment of Plaintiff <input type="checkbox"/> Other (Only list addresses known to Defendant):
4. <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	You are prohibited from having <u>any</u> oral, written, personal, electronic, or other form of contact or communication with Plaintiff. Other(s): PERRY JACOB BELL, VICTORIA SMULEVITZ, ALEXANDRIA BELL, AVERY SOLOMON BELL, JEFF SMULEVITZ, ELISHA MLOTEK, CHANA BELL
5. <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	You are prohibited from making or causing anyone else to make harassing communications to: Plaintiff Other(s) - Same as Item 4 above or list names:
6. <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	You are prohibited from stalking, following or threatening to harm, stalk or follow: Plaintiff Other(s) - Same as Item 4 above or list names:
7. <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	You must pay emergent monetary relief to (describe amount and method): Plaintiff: Dependent(s):
8. <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	You must be subject to intake monitoring of conditions and restraints: Other (evaluations or treatment - describe):
9. <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Psychiatric evaluation:
10. <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Prohibition Against Possession of Weapons: You are prohibited from possessing any and all firearms or other weapons and must immediately surrender these firearms, weapons, permit(s) to carry, application(s) to purchase firearms and firearms purchaser ID card to the officer serving this Court Order. Failure to do so may result in your arrest and incarceration.

PLAINTIFF:

11. <input type="checkbox"/>	12. <input type="checkbox"/>	13. <input type="checkbox"/>	You are granted exclusive possession of (list residence or alternate housing only if specifically known to defendant):
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	You are granted temporary custody of:
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Other relief for - Plaintiff: Other relief for - Children:

LAW ENFORCEMENT OFFICER:

You are to accompany to scene, residence, shared place of business, other (indicate address, time, duration and purpose):

14. <input type="checkbox"/>	15. <input type="checkbox"/>	16. <input type="checkbox"/>	Plaintiff: Defendant:
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NOTICE TO DEFENDANT: A violation of any of the provisions listed in this order may constitute either civil or criminal contempt pursuant to N.J.S.A. 2C:25-30 and may result in your arrest, prosecution, and possible incarceration, as well as an imposition of a fine or jail sentence. **Only a court can modify any of the terms or conditions of this court order.**

Revised: 2/2021, CN: 10070 (DVTRO)

Docket Number	Defendant's Name BETTY SEBROW
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Addendum:

- ☐ TRO denied. Complaint dismissed by Family Part.
- ☐ TRO denied by Municipal Court.
- ☐ TRO denied by Superior Court Judge at De Novo Hearing.
- ☐ TRO granted by Superior Court Judge at De Novo Hearing. The Court has established jurisdiction over the subject matter and the parties pursuant to N.J.S.A. 2C:25-17 et seq., and has found good cause that a prima facie act of domestic violence has been established; that an immediate danger of domestic violence exists and that plaintiff's life, health and well being are endangered; that an emergency restraining Order is necessary pursuant to R. 5:7A(b) and N.J.S.A. 2C:25-28 to prevent the occurrence or recurrence of domestic violence and to search for and seize firearms and other weapons as indicated in this order.
- ☒ TRO granted. The Court has established jurisdiction over the subject matter and the parties pursuant to N.J.S.A. 2C:25-17 et seq., and has found good cause that a prima facie act of domestic violence has been established; that an immediate danger of domestic violence exists and that plaintiff's life, health and well being are endangered; that an emergency restraining Order is necessary pursuant to R. 5:7A(b) and N.J.S.A. 2C:25-28 to prevent the occurrence or recurrence of domestic violence and to search for and seize firearms and other weapons as indicated in this order.

Date/Time	<input type="checkbox"/> Via Telecommunications	s/ _____ Hearing Officer	WEST ORANGE TOWN
07/15/2021 12:36 PM		s/ DENNIS DOWD	ESSEX
Date/Time	<input checked="" type="checkbox"/> Via Telecommunications	Honorable Municipal Court Judge	Court / County
Date/Time	<input type="checkbox"/> Via Telecommunications	s/ _____ Honorable Superior Court Judge	Court / County

All Law Enforcement Officers Will Serve and Fully Enforce This Order

This *ex parte* Domestic Violence Complaint and Temporary Restraining Order meets the criteria of the federal Violence Against Women Act for enforcement outside of the State of New Jersey upon verification of service of defendant. 18 U.S.C.A. 2265 & 2266

This Order Shall Remain in Effect Until Further Order of the Court and Service of Said Order on the Defendant.

Notice to Appear to Plaintiff and Defendant

1. ☒ Both the plaintiff and defendant are ordered to appear for a final hearing on (date) 07/22/2021 at (time) 08:30 AM at the Superior Court, Chancery Division, Family Part, ESSEX County, located at (address)

WILENTZ COURT COMPLEX, 212 WASHINGTON ST, 12TH FLOOR, NEWARK, NJ 07102, 973-776-9300 X57210

Note: You must bring financial information including pay stubs, insurance information, bills and mortgage receipts with you to Court.

2. ☐ Remote: All parties shall appear for a hearing on _____ at _____
- I. ☐ Video Remote Hearing is scheduled at the above date and time. You must attend via video as scheduled. Please contact the court for further details at _____
- II. ☐ Phone Remote Hearing is scheduled at the above date and time. You must attend via Phone as scheduled. Please contact the court for further details at _____
- III. ☐ Remote Hearing is scheduled at the above date and time. You must attend as scheduled. Please contact the court for further details at _____
- IV. ☐ The proceeding will be conducted on the papers. Please contact the court for details _____

3. ☐ The final hearing in this matter shall not be scheduled until: _____

4. ☐ Interpreter needed. Language: _____

Upon satisfaction of the above-noted conditions notify the Court immediately so that a final hearing date may be set.

IMPORTANT: The parties cannot themselves change the terms of this Order on their own. This Order may only be changed or dismissed by the Superior Court. The named defendant cannot have any contact with the plaintiff without permission of the Court.

Notice to Defendant

A violation of any of the provisions listed in this Order or a failure to comply with the directive to surrender all weapons, firearm permits, applications or identification cards may constitute criminal contempt pursuant to N.J.S.A. 2C:29-9(b), and may also constitute violations of other state and federal laws which may result in your arrest and/or criminal prosecution. This may result in a jail sentence.

You have the right to immediately file an appeal of this temporary Order before the Superior Court, Chancery Division, Family Part, as indicated above and a hearing may be scheduled.

Docket Number	Defendant's Name BETTY SEBROW						
Return of Service							
<input checked="" type="checkbox"/> Plaintiff was given a copy of the Complaint / TRO by: <table style="width: 100%; margin-top: 5px;"> <tr> <td style="width: 40%; text-align: center;">HANSON PATRICK</td> <td style="width: 20%; text-align: center;">12:36 PM 07/15/2021</td> <td style="width: 40%; text-align: center;">WEST ORANGE POLICE DEPT.</td> </tr> <tr> <td style="text-align: center; font-size: small;">Print Name</td> <td style="text-align: center; font-size: small;">Time and Date</td> <td style="text-align: center; font-size: small;">Signature / Badge Number / Department</td> </tr> </table>		HANSON PATRICK	12:36 PM 07/15/2021	WEST ORANGE POLICE DEPT.	Print Name	Time and Date	Signature / Badge Number / Department
HANSON PATRICK	12:36 PM 07/15/2021	WEST ORANGE POLICE DEPT.					
Print Name	Time and Date	Signature / Badge Number / Department					
<input type="checkbox"/> I hereby certify that I served the within Complaint / TRO by delivering a copy to the Defendant personally: <table style="width: 100%; margin-top: 5px;"> <tr> <td style="width: 40%; text-align: center;"> </td> <td style="width: 20%; text-align: center;"> </td> <td style="width: 40%; text-align: center;"> </td> </tr> <tr> <td style="text-align: center; font-size: small;">Print Name</td> <td style="text-align: center; font-size: small;">Time and Date</td> <td style="text-align: center; font-size: small;">Signature / Badge Number / Department</td> </tr> </table>					Print Name	Time and Date	Signature / Badge Number / Department
Print Name	Time and Date	Signature / Badge Number / Department					
<input type="checkbox"/> I hereby certify that I served the within Complaint / TRO by use of substituted service as follows: <table style="width: 100%; margin-top: 5px;"> <tr> <td style="width: 40%; text-align: center;"> </td> <td style="width: 20%; text-align: center;"> </td> <td style="width: 40%; text-align: center;"> </td> </tr> <tr> <td style="text-align: center; font-size: small;">Print Name</td> <td style="text-align: center; font-size: small;">Time and Date</td> <td style="text-align: center; font-size: small;">Signature / Badge Number / Department</td> </tr> </table>					Print Name	Time and Date	Signature / Badge Number / Department
Print Name	Time and Date	Signature / Badge Number / Department					
<input type="checkbox"/> Defendant could not be served (explain): <table style="width: 100%; margin-top: 5px;"> <tr> <td style="width: 40%; text-align: center;"> </td> <td style="width: 20%; text-align: center;"> </td> <td style="width: 40%; text-align: center;"> </td> </tr> <tr> <td style="text-align: center; font-size: small;">Print Name</td> <td style="text-align: center; font-size: small;">Time and Date</td> <td style="text-align: center; font-size: small;">Signature / Badge Number / Department</td> </tr> </table>					Print Name	Time and Date	Signature / Badge Number / Department
Print Name	Time and Date	Signature / Badge Number / Department					
The Courthouse is accessible to those with disabilities. Please notify the Court if you require assistance.							
Distribution: Family Part, Plaintiff, Defendant, Sheriff, Other							